

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

REQUEST: Sprint Communications Company L.P.'s, Set #1

DATED: April 23, 2002

ITEM: Sprint-VZ 1-1 Please provide a copy of Verizon's responses to all discovery requests, including but not limited to interrogatories and data requests, served upon Verizon in this proceeding.

REPLY: A copy has been provided.

VZ # 120

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence R. Craft

Title: Manager

REQUEST: Sprint Communications Company L.P.'s, Set #1

DATED: April 23, 2002

ITEM: Sprint-VZ 1-2 Page 2, Lines 5-8: Please provide all studies, workpapers, data, statistics, analyses, and other documents that support the statement that there is increased potential for network harm resulting from the presence of physical collocation.

REPLY: See Verizon MA's Replies to AG 1-1, Allegiance 1-26, and Qwest 1-38, as well as Verizon MA's Panel Testimony (pp. 4-6, 27-40).

VZ # 121

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence R. Craft

Title: Manager

REQUEST: Sprint Communications Company L.P.'s, Set #1

DATED: April 23, 2002

ITEM: Sprint-VZ 1-3 Page 2, Line 6: Please explain and document "Verizon's experience," including a list and description of all security breaches, damage, vandalism, and terrorist acts at Verizon central offices and/or collocation sites. For each alleged breach, damage, vandalism, theft and terrorist act, please describe the date it occurred, the location, any responsive or corrective action taken by Verizon or other companies or governmental or law enforcement agencies, the actual harm incurred in terms by dollar amount, and provide a copy of any police reports or insurance claims.

REPLY: See Verizon MA's Reply to AG 1-1

VZ # 122

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Francesco S. Mattera

Title: Director

REQUEST: Sprint Communications Company L.P.'s, Set #1

DATED: April 23, 2002

ITEM: Sprint-VZ 1-4 Page 4, Line 3: Please quantify the "potential for network harm," describe how it was determined and assessed, quantify the potential for network harm, and provide all supporting workpapers, analyses, studies and documentation.

REPLY: Verizon MA has not assessed or quantified the potential network harm, which could range from service affecting conditions disrupting service for a single customer up to tens of thousands of customers, depending on the nature of the incident and components of the network affected. See also Verizon MA's Reply to AG 1-1.

VZ # 123

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence R. Craft

Title: Manager

Respondent: Francesco S. Mattera

Title: Director

REQUEST: Sprint Communications Company L.P.'s, Set #1

DATED: April 23, 2002

ITEM: Sprint-VZ 1-5 Page 5, lines 14-18; Page 6, Lines 1-3: Please explain why these proposed security measures and enhancements are necessary because of the present network architecture and configuration of equipment and facilities in Verizon's central offices ("COs") and remote terminals ("RTs"), and why they will better protect the telecommunications network, maximize safety, reduce risk to Verizon's facilities and enable Verizon to provide reliable service. Please provide all supporting studies, analyses, statistics, workpapers and other documents.

REPLY: See Verizon MA's Replies to AG 1-1, Sprint 1-2, Conversent 1-12, and Allegiance 1-11 and 1-26, as well as Verizon MA's Panel Testimony (pp. 24-38).

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence R. Craft

Title: Manager

Respondent: Francesco S. Mattera

Title: Director

REQUEST: Sprint Communications Company L.P.'s, Set #1

DATED: April 23, 2002

ITEM: Sprint-VZ 1-6 Page 18, Lines 1-3: Please provide all documents, analyses, statistics, workpapers and other documents that support the statement that Verizon does not consider its current collocation security measures to provide adequate protection.

REPLY: See Verizon MA's Replies to Sprint 1-2, Conversent 1-12, and Allegiance 1-11 and 1-26, as well as Verizon MA's Panel Testimony (pp. 24-38).

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence R. Craft
Title: Manager

REQUEST: Sprint Communications Company L.P.'s, Set #1

DATED: April 23, 2002

ITEM: Sprint-VZ 1-7 Page 18, Lines 10-11: Please provide all documents, analyses, statistics, workpapers and other documents that support the statement that the current tracking measures will not prevent some individuals from causing either intentional or unintentional damage to Verizon's network.

REPLY: See Verizon MA's Reply to Attorney General 1-1.

VZ # 126

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lynelle Reney
Title: Director

REQUEST: Sprint Communications Company L.P.'s, Set #1

DATED: April 23, 2002

ITEM: Sprint-VZ 1-8 Page 19, Lines 13-17: Must CLECs coordinate with Verizon to access common areas at Verizon COs located in Massachusetts?

REPLY: CLEC access to Verizon's COs is described in DTE MA No. 17, Part E, 2.2.5.A. Access to the common areas (e.g., loading docks, elevators and temporary staging areas) for both Verizon and CLEC employees, as a practical matter, is coordinated with the Central Office/Property Manager. See also Verizon MA's Replies to Allegiance 1-1 and Qwest 1-40.

VZ # 127

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence R. Craft

Title: Manager

Respondent Robert D. Jacobs

Title: Director

REQUEST: Sprint Communications Company L.P.'s, Set #1

DATED: April 23, 2002

ITEM: Sprint-VZ 1-9 Page 21, Line 20: Please list and describe all security violations at Verizon's COs in Massachusetts. For each alleged security violation, please provide the specific location and date of the violation, describe any corrective and/or responsive action taken, and provide a copy of the insurance claim and police report.

REPLY: See Verizon MA's Reply to AG 1-1.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence R. Craft

Title: Manager

Respondent: Robert D. Jacobs

Title: Director

REQUEST: Sprint Communications Company L.P.'s, Set #1

DATED: April 23, 2002

ITEM: Sprint-VZ 1-10 Please list and describe all security violations at Verizon's COs in Massachusetts or elsewhere done by Verizon certified vendors.

REPLY: To the extent that any security violations were caused by Verizon certified vendors, they would be included in Verizon MA's Reply to AG 1-1.

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Francesco S. Mattera

Title: Director

Respondent: Lawrence R. Craft

Title: Manager

Respondent: Robert D. Jacobs

Title: Director

REQUEST: Sprint Communications Company L.P.'s, Set #1

DATED: April 23, 2002

ITEM: Sprint-VZ 1-11 How many certified contractors have lost certification for accidental violations at Verizon COs in Massachusetts?

REPLY: Verizon MA does not utilize contractors to perform installation work on its central office equipment. See also Verizon MA's Reply to Sprint 1-10.

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence R. Craft

Title: Manager

Respondent: Robert D. Jacobs

Title: Director

REQUEST: Sprint Communications Company L.P.'s, Set #1

DATED: April 23, 2002

ITEM: Sprint-VZ 1-12 Please list and describe all security violations, damage, and/or theft to CLEC property collocated at Verizon COs in Massachusetts, and Verizon's corrective or responsive actions for each reported violation, damage or theft.

REPLY: See Verizon MA's Reply to AG 1-1

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence R. Craft

Title: Manager

Respondent: Robert D. Jacobs

Title: Director

REQUEST: Sprint Communications Company L.P.'s, Set #1

DATED: April 23, 2002

ITEM: Sprint-VZ 1-13 Page 22: For each alleged security violation, please provide the specific location and date of the violation, the perpetrator (CLEC, vendor, etc.), describe any corrective and/or responsive action taken, and provide a copy of the insurance claim and police report.

REPLY: To the extent that this level of detail is available, it would be included in the information provided in Verizon MA's Reply to AG 1-1

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence R. Craft

Title: Manager

Respondent: Francesco S. Mattera

Title: Director

REQUEST: Sprint Communications Company L.P.'s, Set #1

DATED: April 23, 2002

ITEM: Sprint-VZ 1-14 Page 23, Lines 1-3: Please provide all documentation, statistics, workpapers, and analyses that support the statement that numerous different collocators, employees and agents increases the probability of accidents, mistakes, wrongdoing ("sic") and exposure to financial harm and damage to Verizon's network.

REPLY: See Verizon MA's Replies to Sprint 1-2, 1-4 and 1-5, and XO 1-3.

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence R. Craft
Title: Manager

REQUEST: Sprint Communications Company L.P.'s, Set #1

DATED: April 23, 2002

ITEM: Sprint-VZ 1-15 How does Verizon plan to provide security for CLECs? Please list all proposed security measures that will protect CLECs' property and interests?

REPLY: See Verizon MA's Panel Testimony, pages 28-41, as well as Verizon MA' Replies to Allegiance 1-2 and Conversent 1-4(e).

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lynelle Reney

Title: Director

REQUEST: Sprint Communications Company L.P.'s, Set #1

DATED: April 23, 2002

ITEM: Sprint-VZ 1-16 How many Verizon COs are exempt from physical collocation in Massachusetts? Please identify each CO that is exempt from physical collocation.

REPLY: The following ten Massachusetts central offices are currently on the Verizon Physical Collocation Space Exhaust List: Auburn, Barnstable, East Douglas, Essex, Harvard, Middleton, Princeton, Shirley, Sudbury and Westboro. That information is also available on Verizon's website:
http://128.11.40.241/east/wholesale/resources/pdf/4-17-02_Space%20Exhaust%20List.pdf

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lynelle Reney
Title: Director

REQUEST: Sprint Communications Company L.P.'s, Set #1

DATED: April 23, 2002

ITEM: Sprint-VZ 1-17 How many CLECs are waiting for space in Massachusetts at COs where Verizon has reserved space for itself? Please identify each CO location when responding to this question.

REPLY: There are no CLECs waiting for space in Massachusetts at COs where Verizon has reserved space for itself.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Francesco S. Mattera
Title: Director

REQUEST: Sprint Communications Company L.P.'s, Set #1

DATED: April 23, 2002

ITEM: Sprint-VZ 1-18 How many CLECs are waiting for space in Massachusetts at COs that would become virtual collocation only sites under Verizon's proposal? Please identify each CO location when responding to this question

REPLY: See Verizon MA's Replies to XO 1-4 and Qwest 1-11.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lynelle Reney
Title: Director

REQUEST: Sprint Communications Company L.P.'s, Set #1

DATED: April 23, 2002

ITEM: Sprint-VZ 1-19 Please provide the average CLEC waiting time for collocation space at each Verizon CO in Massachusetts.

REPLY: Verizon MA does not track the average CLEC waiting time for collocation space in space constrained central offices.

VZ # 138

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lynelle Reney
Title: Director

REQUEST: Sprint Communications Company L.P.'s, Set #1

DATED: April 23, 2002

ITEM: Sprint-VZ 1-20 Page 24, Line 6: Please define "reasonable access" as used in this sentence.

REPLY: The term "reasonable access" is used by the Federal Communications Commission (FCC) in its *Advanced Services Order* (paragraph 49), as indicated in Verizon MA's Panel Testimony, page 34. Authorized CLEC employees, agents and contractors have – and would continue to have – reasonable access to CO common areas in accordance with FCC requirements and as described in DTE MA Tariff No.17, Part E, Sec 2.2.5.A. That tariff provision states that "[t]he reasonable use of shared building facilities (*e.g.*, elevators, unrestricted corridors, designated restrooms, etc.) will be permitted." See also Verizon MA's Reply to Sprint 1-8.

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lynelle Reney
Title: Director

REQUEST: Sprint Communications Company L.P.'s, Set #1

DATED: April 23, 2002

ITEM: Sprint-VZ 1-21 Page 24, Line 7: Please define "feasible" as used in this sentence.

REPLY: CLECs are provided reasonable access to shared facilities outside the secured and segregated collocation space where partitioning of Verizon MA's equipment is technically feasible. This means that there is sufficient space or building conditions to establish secure separation of Verizon's equipment from CLECs' collocated equipment space or routes used to access shared basic facilities, such as loading docks, elevators, temporary staging areas or access to restrooms). As described in Verizon MA's Replies to Qwest 1-40 and 1-43 and Allegiance 1-1, when access to shared facilities (e.g., loading docks, elevators or temporary staging areas) are not secured from Verizon MA equipment areas, access is prearranged and scheduled with Verizon MA in accordance with existing practices.

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Francesco S. Mattera
Title: Director

REQUEST: Sprint Communications Company L.P.'s, Set #1

DATED: April 23, 2002

ITEM: Sprint-VZ 1-22 Page 37, Lines 3-4: Please provide all documents, analyses, statistics, and studies that support the statement that it would be practically impossible to segregate Verizon's equipment into separate space in an RT.

REPLY: See Verizon MA's Reply to Allegiance 1-26. See also Attachment 3 to Verizon MA's Panel Testimony.

VZ # 141

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Francesco S. Mattera

Title: Director

REQUEST: Sprint Communications Company L.P.'s, Set #1

DATED: April 23, 2002

ITEM: Sprint-VZ 1-23 Page 39, Lines 16-17: Please list the "critical" COs in Massachusetts where Verizon proposes that virtual collocation only should be required. If Verizon has not yet determined which COs are "critical", please provide a Verizon's estimate of which COs are "critical".

REPLY: See Verizon MA's Reply to XO 1-4. Since no criteria has been established by the Department and Verizon MA to determine what qualifies as a "critical" CO, it would be speculative for the Company to identify projected COs at this time.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence R. Craft
Title: Manager

REQUEST: Sprint Communications Company L.P.'s, Set #1

DATED: April 23, 2002

ITEM: Sprint-VZ 1-24 Page 20: Has Verizon done any studies regarding thumb print scanner costs? If so, please provide the study and study results.

REPLY: Verizon MA has conducted no such cost studies.

VZ # 143

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence R. Craft

Title: Manager

Respondent: Robert D. Jacobs

Title: Director

REQUEST: Sprint Communications Company L.P.'s, Set #1

DATED: April 23, 2002

ITEM: Sprint-VZ 1-25 Page 20, footnote 18: How many Verizon employees have been fired for violations of propping a door open at a Verizon CO when they are bringing in equipment?

REPLY: Verizon MA is unaware of any employees who have been fired for propping a door open at a Verizon CO when bringing in equipment. To the extent that any disciplinary action is required, such matters would be handled at the local level, i.e. by the CO supervisor.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence R. Craft

Title: Manager

Respondent: Robert D. Jacobs

Title: Director

REQUEST: Sprint Communications Company L.P.'s, Set #1

DATED: April 23, 2002

ITEM: Sprint-VZ 1-26 Page 20, footnote 18: How many certified vendor violations and/or vendor de-certifications have there been for violations of propping a door open at a Verizon CO when that are bringing in equipment?

REPLY: See Verizon MA's Replies to Sprint 1-10 and 1-11.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lynelle Reney
Title: Director

REQUEST: Sprint Communications Company L.P.'s, Set #1

DATED: April 23, 2002

ITEM: Sprint-VZ 1-27 Must CLECs use Verizon-certified vendors? Are these Verizon-certified vendors the same contractors that Verizon uses?

REPLY: See Verizon MA's Reply to Qwest 1-38.

VZ # 146

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence R. Craft
Title: Manager

REQUEST: Sprint Communications Company L.P.'s, Set #1

DATED: April 23, 2002

ITEM: Sprint-VZ 1-28 Please provide all costs, including cost studies, for Verizon's recommended security plan. If Verizon has not determined these costs, please provide a good-faith estimate of Verizon's anticipated costs for each security measure.

REPLY: Verizon MA has conducted no such cost studies. See also Verizon MA's Reply to XO 1-6.

VZ # 147